

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

GEORGE P. STEVENS,

CIVIL DIVISION

Docket No.:

Plaintiff,

NOTICE OF REMOVAL

v.

SAFE AUTO INSURANCE COMPANY,

Defendant.

Filed on Behalf of Defendant,
Safe Auto Insurance Company

Counsel for this Party:

Jeffrey C. Catanzarite, Esquire
PA I.D. #72765

**SUMMERS, McDONNEL, HUDOCK
& GUTHRIE, P.C.**

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Suite 2400
Pittsburgh, PA 15219

(412) 261-3232

#20856

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

GEORGE P. STEVENS,

CIVIL DIVISION

Plaintiff,

Docket No.:

v.

SAFE AUTO INSURANCE COMPANY,

Defendant.

NOTICE OF REMOVAL

Defendant, Safe Auto Insurance Company, by and through its attorneys, Summers, McDonnell, Hudock & Guthrie, P.C. and Jeffrey C. Catanzarite, Esquire and files this Notice of Removal of Civil Action from the Court of Common Pleas of Allegheny County, Pennsylvania, and in support thereof avers as follows:

1. On or about October 3, 2014, the Plaintiff, George P. Stevens (hereinafter "Plaintiff") commenced this action in the Court of Common Pleas of Allegheny County, Pennsylvania by filing a Complaint against Safe Auto Insurance Company (hereinafter "Defendant") at Docket No. GD 14-018020. (A true and correct copy of the Complaint is attached hereto as Defendant's **Exhibit "A"**.)

2. The concise statement of facts which entitled Defendant to remove this action filed in the Court of Common Pleas of Allegheny County, Pennsylvania are:

- (a) Plaintiff was a citizen of Pennsylvania at the time of the initiation of the action and, upon information and belief continues to maintain citizenship in Pennsylvania;
- (b) Defendant, Safe Auto Insurance Company is a corporation that is organized and incorporated under the laws of the State of Ohio, with its principal place of business in

Columbus, Ohio. The Defendant continues to maintain its principal place of business in Columbus, Ohio;

- (c) It is the Defendant's good faith belief that the amount in controversy exceeds \$75,000 exclusive of interest and costs; and
- (d) This Court has original jurisdiction of the above-titled action pursuant to 28 U.S.C. §1332 and the action may therefore be removed to this Court pursuant to 28 U.S.C. §1441(a).

3. This Notice of Removal is filed within thirty (30) days of receive Plaintiff's Complaint in Civil Action and is therefore, timely filed under 28 U.S.C. §1446(b).

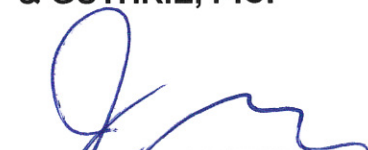
4. Insofar as there are claims where complete diversity is involved wherein the matter in controversy exceeds the statutory set limit of \$75,000 and this Notice of Removal was timely filed, Defendant respectfully requests that This Honorable Court remove the Civil Action of Plaintiff to the Federal District Court for the Western District of Pennsylvania.

WHEREFORE, Defendant, Safe Auto Insurance Company respectfully requests that this action be removed from the Court of Common Pleas of Allegheny County, Pennsylvania, to This Honorable Court.

(JURY TRIAL DEMANDED)

Respectfully Submitted,

**SUMMERS, McDONNELL, HUDOCK
& GUTHRIE, P.C.**



Jeffrey C. Catanzarite, Esquire
Counsel for Defendant,
Safe Auto Insurance Company

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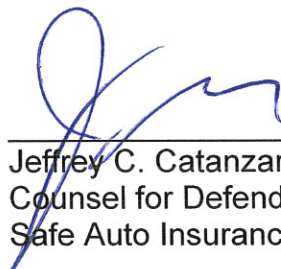
Defendant.

CERTIFICATE

I HEREBY CERTIFY that a Notice of Filing of the **Notice of Removal**, together with a true and correct copy of the **Notice** itself was served on the 28th day of October, 2014, via electronic filing, with the Department of Court Records of the Court of Common Pleas of Allegheny County, Pennsylvania and that a true and correct copy of said **Notice** was duly served on all counsel of record via first-class mail, postage prepaid to the following:

John R. Orie, Jr., Esquire
Orie, LLC
2500 Lawyers Building
428 Forbes Avenue
Pittsburgh, PA 15219

**SUMMERS, McDONNELL, HUDOCK
& GUTHRIE, P.C.**



Jeffrey C. Catanzarite, Esquire
Counsel for Defendant,
Safe Auto Insurance Company